

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CASE NO.: 1:25-cv-06145

VOLTSTAR TECHNOLOGIES, INC.,

Plaintiff,

v.

ICE TECHNOLOGIES LLC,

Defendant.

PLAINTIFF’S MOTION FOR EXTENSION OF TIME

Plaintiff VOLTSTAR TECHNOLOGIES, INC. by and through its undersigned counsel, hereby moves this Honorable Court for an extension of time to file the Motion for Final Default Judgment, and as grounds therefore states as follows:

1. Plaintiff VOLTSTAR TECHNOLOGIES, INC. (“Voltstar”) filed its Complaint for Patent Infringement against Defendant ICE TECHNOLOGIES LLC (“Ice Technologies”) on June 2, 2025. [DE 1]
2. Ice Technologies was served with a copy of the Complaint and Summons by substitute service, by serving their registered agent CT Corporation System at 208 SO Lasalle Street, Suite 814, Chicago, IL 60604 on June 5, 2025. [DE 9]
3. On June 30, 2025, Plaintiff filed its Motion for Entry of Clerk’s Default. [DE 12]
4. On July 2, 2025, the Clerk entered Default against Defendant Ice Technologies, LLC. [DE 13]
5. Plaintiff was directed to file the Motion for Final Default Judgment by August 1, 2025. [DE 13]

6. Plaintiff sent correspondence via email to Bluestar Alliance, the licensor of Ice Technologies, LLC's infringing Brookstone chargers.

7. Plaintiff is awaiting relevant information from Bluestar Alliance in progress in this case, or in order to file the Motion for Final Default Judgment.

8. Plaintiff respectfully requests an extension of 30-days, up to and including **September 2, 2025**, to file the Motion for Final Default Judgment.

9. This request is made in good faith and not for the purpose of obstruction or delay.

WHEREFORE, Plaintiff VOLTSTAR TECHNOLOGIES, INC. prays this Honorable Court for an extension of time, up to and including **September 2, 2025**, and for such other and further relief as to this Court deems just and proper in the premises.

Dated: August 1, 2025

Respectfully submitted,

/s/ Layla T. Nguyen
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